

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Steven W. Rhodes
Debtor	:	
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**STIPULATION FOR WITHDRAWAL OF  
SATISFIED CLAIM OF ATLANTIC COAST POLYMERS INC.**

Atlantic Coast Polymers Inc. (“Atlantic Coast”) and the City of Detroit, Michigan (the “City”), by and through the undersigned, stipulate as follows in support of the entry of the *Order Withdrawing Satisfied Claim of Atlantic Coast Polymers Inc.* attached hereto as **Exhibit 1**.

1. On December 23, 2013, Atlantic Coast filed its proof of claim [Claim No. 342] (the “Claim”) in the amount of \$44,000.
2. The Claim alleged \$44,000 as a general unsecured claim.
3. In the ordinary course of its business, the City has paid Atlantic Coast all of the amounts sought in the Claim.
4. Atlantic Coast hereby withdraws the Claim in its entirety because the Claim has been fully satisfied.
4. Nothing in this Stipulation or the proposed order attached hereto as Exhibit 1 addresses any post-petition claims which have arisen or may arise between the City and Atlantic Coast. Both parties fully reserve all of their respective rights with respect to any post-petition claims.

**WHEREFORE** the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** withdrawing the Claim.

Respectfully submitted by:

<b>ATLANTIC COAST POLYMERS INC.</b>	<b>FOLEY &amp; LARDNER, LLP</b>
By: <u>/s/ Helen Lehman (with consent)</u> Atlantic Coast Polymers, Inc. 6207 Beecaves Road, Suite 180 Austin, TX 78746 Phone: (512) 732-0007  <i>Representative of Atlantic Coast Polymers, Inc.</i>	By: <u>/s/ Jeffrey S. Kopp</u> Jeffrey S. Kopp (P59485) John A. Simon (P61866) Tamar N. Dolcourt (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jkopp@foley.com jsimon@foley.com tdolcourt@foley.com  <i>Counsel to the City of Detroit, Michigan</i>

Dated: January 30, 2015

**WHEREFORE** the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** withdrawing the Claim.

Respectfully submitted by:

<b>ATLANTIC COAST POLYMERS INC.</b>  By: <u>/s/ Helen Lehman</u>	<b>FOLEY &amp; LARDNER, LLP</b>  By: <u>/s/ Jeffrey S. Kopp</u> Jeffrey S. Kopp (P59485) John A. Simon (P61866) Tamar N. Dolcourt (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jkopp@foley.com jsimon@foley.com tdolcourt@foley.com  <i>Counsel to the City of Detroit, Michigan</i>
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Dated: January ~~30th~~ 2015